

Fill in this information to identify the case:

Debtor1 Miguel Angel Garcia

Debtor 2
(Spouse, if filing)

United States Bankruptcy Court for the : MIDDLE District of Pennsylvania
(State)

Case number 5:21-bk-00672-MJC

Form 4100R Response to Notice of Final Cure

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor: Towd Point Mortgage Trust 2019-4, U.S. Bank
National Association, as Indenture Trustee

Court claim no. (if known): 2-2

Last 4 digits of any number you use to identify the debtor's account: 6802

Property address: 106 CORNELIA LN
Number Street

MILFORD, PA 18337
City State ZIP Code

Part 2: Prepetition Default Payments

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full amount required to cure the prepetition default on the creditor's claim
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is:

\$ _____

Part 3: Postpetition Mortgage

Check one:

- ☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 4/1/2024
MM/DD/YYYY

- ☐ Creditor states that the debtors are not current on all postpetition payments consistent with § 1322 (b)(5) of the Bankruptcy Code, including all fees charges expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$ _____
- b. Total fees, charges, expenses, escrow and costs outstanding: + (b) \$ _____
- c. Total. Add lines a and b. (c) \$ _____

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

MM/ DD/ YYYY

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☒ all payments received;
☒ all fees, costs, escrow, and expenses assessed to the mortgage; and
☒ all amounts the creditor contends remain unpaid

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim

Check the appropriate box:

- ☐ I am the creditor.
☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

☒ /s/ Michelle L. McGowan
Signature

Date 4/11/2024

Print Michelle L. McGowan
First Name Middle Name Last Name Title Authorized Agent

Company Robertson, Anschutz, Schneid, Crane & Partners, PLLC

If different from the notice address listed on the proof of claim to which this response applies:

Address 13010 Morris Rd., Suite 450
Number Street
Alpharetta, GA 30004
City State ZIP Code

Contact 470-321-7112

Email mimcgowan@raslg.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 11, 2024 I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, and a true and correct copy has been served via United States Mail to the following:

Miguel Angel Garcia
106 Cornelia Lane
Milford, PA 18337

And via electronic mail to:

Robert J Kidwell, III
Newman Williams
712 Monroe Street
Stroudsburg, PA 18360

Jack N Zaharopoulos
Standing Chapter 13
(Trustee)
8125 Adams Drive, Suite A
Hummelstown, PA 17036

United States Trustee
US Courthouse
1501 N. 6th St
Harrisburg, PA 17102

By: /s/ *Justine Bennett*
Justine Bennett
Email: Jusbennett@raslg.com